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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

This Document Relates To:

*Motorola Mobility, Inc. v. AU Optronics
Corporation, et al., C 09-5840 SI*

*Target Corporation, et al., v. AU Optronics
Corporation, et al., 3:10-cv-4945 SI*

Master Docket No. 07-m-1827 SI

**STIPULATION AND [PROPOSED]
ORDER REGARDING RULE 30(B)(6)
DEPOSITION OF PHILIPS
ELECTRONICS NORTH AMERICA
CORPORATION AND FACT
DISCOVERY CUT-OFF**

1 Defendant Philips Electronics North America Corporation ("PENAC") and Plaintiffs
2 Motorola Mobility, Inc.; Target Corp.; Sears, Roebuck and Co.; Kmart Corp.; Old Comp Inc.;
3 Good Guys, Inc.; RadioShack Corp; and Newegg Inc. ("Plaintiffs") stipulate as follows:

4 WHEREAS Plaintiffs have noticed the deposition of PENAC pursuant to Federal Rule of
5 Civil Procedure 30(b)(6);

6 WHEREAS the discovery cut-off in the Direct Action Plaintiffs' track one cases is
7 December 8, 2011;

8 WHEREAS PENAC was added to Plaintiffs' respective actions in the past few months;

9 WHEREAS the parties have had limited time to conduct discovery;

10 WHEREAS PENAC is still diligently working to produce documents to Plaintiffs;

11 WHEREAS Plaintiffs and PENAC have met and conferred regarding scheduling the Rule
12 30(b)(6) deposition of PENAC; and

13 WHEREAS the parties are discussing a potential resolution to the above-captioned
14 actions;

15 THEREFORE, PENAC, by its counsel, and Plaintiffs, by the undersigned counsel,
16 stipulate and agree as follows:

17 1. The fact discovery cutoff date of December 8, 2011 set forth in the Order
18 Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General
19 Cases (MDL Dkt. No. 3110) is extended up to and including February 29, 2012, solely as to the
20 deposition of PENAC.

21 2. If disputes arise at the deposition, Plaintiffs will have five court days to move to
22 compel further responses.

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3. Unless expressly provided herein, nothing in this Stipulation and Order is intended to modify any other Order of the Court or the Special Master, nor does this order prevent any party from seeking further modifications to such orders.

Dated: December 6, 2011

/s/ Nathaniel J. Wood

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**Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the
filing of this document has been obtained from the other signatories.**

IT IS SO ORDERED.

Dated: 12/8, 2011



Susan Illston, United States District Judge

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